



HON. SYLVIA O. HINDS-RADIX
Corporation Counsel

THE CITY OF NEW YORK
LAW DEPARTMENT

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NEW YORK, NY 10007

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Application granted. No further
extensions.


May 7, 2024

VIA ECF

Hon. Arun Subramanian
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007

The Clerk of Court is directed to terminate
the motion at Dkt. 19.

SO ORDERED.


Arun Subramanian, U.S.D.J.
Date: May 7, 2024

Re: *S.S. v. N.Y.C. Dep't of Educ.*, 23-cv-9166 (AS)(OTW)

Dear Judge Subramanian:

I am a Special Assistant Corporation Counsel in the Office of Corporation Counsel, Hon. Sylvia O. Hinds-Radix, attorney for Defendants in the above-referenced action, wherein Plaintiff seeks attorneys' fees, costs and expenses for legal work on an administrative hearing under the Individuals with Disabilities Education Act, 20 U.S.C. § 1400, *et seq.* ("IDEA"), as well as for this action.

The parties write jointly to respectfully request a 14-day adjournment of the current briefing schedule, from May 13 to May 28, 2024,¹ for Plaintiff's time to submit a Motion for Summary Judgment for Fees, and consequently, from May 27 to June 10 for Defendants' response, and from June 3 to June 17 for Plaintiff's reply. This is the first request for an adjournment. The reason for the requested extension is that since the Court set the briefing schedule (and acknowledging that Your Honor had indicated no extensions on April 12 (ECF No. 17)), this matter has been reassigned to the undersigned from another attorney (who is no longer at the Law Department), and new counsel therefore needs time to familiarize themselves with the case. Additionally, Plaintiff's counsel's supervisor, Ms. Elisa Hyman, is currently out of the country, returning May 13, 2024. Ms. Hyman is a necessary participant and declarant in the motion, as the head of the law firm. This request is not prejudicial as this case involves a simple fee application, and the parties remain optimistic that this matter could be fully resolved through settlement before the motion would be due on May 28, 2024.

Accordingly, the parties respectfully request that the Court grant a 14-day adjournment of the current briefing schedule, with Plaintiff's motion due May 28, Defendants' response due June 10, and Plaintiff's reply due June 17.

¹ May 27th is Memorial Day, a federal holiday.

Thank you for considering this request.

Respectfully submitted,

/s/

Lauren Howland

Special Assistant Corporation Counsel

cc: Erin O'Connor, Of Counsel (via ECF)